

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

IN RE:

WAYNE GERALD ROBINSON,
DEBTOR

: CHAPTER 13
: CASE NO.: 24-13559-pmm
: HEARING DATE: 11/12/2024
: TIME: 10 AM
: LOCATION: HEARING ROOM #4

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Berks Fire Water Restorations, Inc., having filed a Motion for relief from the automatic stay under 11. U.S. Code §1301.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before 11/6/2024 you or your attorney must do all of the following:

(a) file an answer explaining your position at:
U.S. Bankruptcy Court
The Gateway Building
Eastern District of Pennsylvania
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:
Nicole Plank, Esquire
Plank Frankowski
4 Park Plaza, 2nd Floor
Wyomissing, PA 19610
Phone: 610-898-9500
Fax: 610-898-0276

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before Judge Patricia M. Mayer on Tuesday, November 12, 2024 at 10 a.m., The Gateway Building, 201 Penn Street, 4th Floor Courtroom, Reading, PA 19601. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Dated: 10/22/2024

/s/ NICOLE PLANK, ESQUIRE
PA ATTORNEY NO. 90421
Attorney for Movant
Plank ♦ Frankowski
4 Park Plaza, Suite 205
Wyomissing, Pennsylvania 19610
Tel. (610) 898-9500
Email: nplank@pflegalgroup.com
Facsimile: (610) 898-0276